

November 12, 2021

Via email: paula.wilson@deq.idaho.gov

Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

Re: Air Quality: Docket No. 58-0101-2101

Dear Ms. Wilson:

Idaho Association of Commerce & Industry ("IACI") appreciates the opportunity to comment on DEQ's zero based regulation negotiated rulemaking regarding rules for the control of air pollution in Idaho, Docket No. 58-0101-2101.

IACI members have commenced a review of the entire document provided at the first negotiated rulemaking meeting on October 28, 2021, and offer the following preliminary comments at this time.

IACI appreciates the efforts of DEQ in following the Governor's Executive Order to simplify their rules through this process. We commend DEQ for the tremendous undertaking of reviewing the entire air quality docket. Many of the simplifications being made appear to have merit.

While we generally support simplifying and updating the docket, many sections in the rule are there for a reason and we want to make sure there is the opportunity for a thorough review of all the proposed changes prior to the rule being presented to the Legislature. We believe IACI and DEQ share the goal of simplifying the rule while not losing necessary context with the rule.

IACI members will review all the changes to the docket and look forward to providing more detailed comments as the rulemaking progresses. To that end we request the comment period remain open for the time being to allow time for a more thorough review of the docket.

Thank you for the opportunity to comment on this rulemaking.

Sincerely,



Alex LaBeau
President

cc: Alan Prouty, Chair
IACI Environment Committee